

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	)	
	)	Chapter 11
MVK FARMCO LLC, <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 23-11721 (LSS)
	)	
Debtors.	)	(Joint Administration Requested)
	)	

**NOTICE OF APPEARANCE AND  
DEMAND FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the attorneys set forth below hereby appear on behalf of Coöperatieve Rabobank U.A., New York Branch (the “Prepetition Bridge Administrative Agent and Prepetition Bridge PropCo Collateral Agent”), in the above-referenced cases, and demand, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Sections 1109(b) and 342 of Title 11 of the United States Code (the “Bankruptcy Code”), that all notices given in the above-captioned cases and all papers served or required to be served in the above-captioned cases be given to and served upon the undersigned counsel at the addresses set forth below:

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Andrew Zatz  
Elizabeth Feld  
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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: MVK FarmCo LLC (5947); MVK Intermediate Holdings LLC (6016); Gerawan Farming LLC (1975); Gerawan Supply, Inc. (6866); Gerawan Farming Partners LLC (0072); Gerawan Farming Services LLC (7361); Wawona Farm Co. LLC (1628); Wawona Packing Co. LLC (7637); and GFP LLC (9201). The location of the Debtors’ service address is: 7700 N. Palm Ave., Suite 206, Fresno, CA 93711.

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any application, motion, order, petition, pleading, request, complaint, or demand, statement of financial affairs, operating report, schedule of assets and liabilities, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile transmission, or otherwise, that affects the debtor, property of the debtor, or property of the estate.

**PLEASE TAKE FURTHER NOTICE** that this appearance and demand for notice shall not be deemed or construed to be a (i) consent to the jurisdiction and/or venue of the Bankruptcy Court, or (ii) a waiver of the Prepetition Bridge Administrative Agent and Prepetition Bridge PropCo Collateral Agent's rights (a) to have final orders in noncore matters entered only after *de novo* review by a District Judge, (b) to trial by jury in any proceedings so triable in these cases or any case, controversy or proceeding related to these cases, (c) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (d) to any other rights, claims, actions, setoffs or recoupments to which the Prepetition Bridge Administrative Agent and Prepetition Bridge PropCo Collateral Agent is or may be entitled in law or equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Prepetition Bridge Administrative Agent and Prepetition Bridge PropCo Collateral Agent expressly reserves.

Dated: October 16, 2023  
Wilmington, Delaware

/s/ Mark D. Collins  
Mark D. Collins (No. 2981)  
David T. Queroli (No. 6318)  
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-and-

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*Counsel for Coöperatieve Rabobank  
U.A., New York Branch, as the Prepetition  
Bridge Administrative Agent and Prepetition  
Bridge PropCo Collateral Agent*

**CERTIFICATE OF SERVICE**

I, David T. Queroli, hereby certify that on October 16, 2023, I caused a copy of the foregoing *Notice of Appearance and Demand for Services of Notices and Papers* to be served upon the following parties in the manner indicated.

<p><u><i>Via CM/ECF &amp; Email</i></u></p> <p>Joseph Barry Kenneth J. Enos Andrew A. Mark YOUNG CONAWAY STARGATT &amp; TAYLOR, LLP Rodney Square 1000 North King Street Wilmington, DE 19801 Tel: (302) 571-6600 Fax: (302) 571-1253 Email: jbarry@ycst.com kenos@ycst.com amark@ycst.com</p>	<p><u><i>Via Email &amp; First Class Mail</i></u></p> <p>Ryan Blaine Bennett Whitney C. Fogelbery KIRKLAND &amp; ELLIS LLP KIRKLAND &amp; ELLIS INTERNATIONAL LLP 300 North LaSalle Street Chicago, IL 60654 Tel: (312) 862-2000 Fax: (312) 862-2200 Email: ryan.bennett@kirkland.com whitney.fogelberg@kirkland.com</p> <p><u><i>Via CM/ECF, Email &amp; First Class Mail</i></u></p> <p>Rosa Sierra-Fox OFFICE OF THE UNITED STATES TRUSTEE 844 King Street, Suite 2207 Lockbox #35 Wilmington, DE 19801 Tel: (302) 573-6491 Fax: (302) 573-6497 Email: rosa.sierra-fox@usdoj.gov</p>
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/s/ David T. Queroli  
David T. Queroli (No. 6318)